

REMARKS

In response to the Office Action dated April 30, 2009, the Applicants have amended claims 1, 7, 14, 19 and 23. Claims 1-25 are in the case. This amendment is in accordance with 37 C.F.R. § 1.111. Reexamination and reconsideration of the application, as amended, are requested.

Rejection under 35 U.S.C. § 101

The Office Action rejected claims 1-12 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter.

In response, the Applicants have amended the claims as suggested by the Examiner to overcome this rejection.

Rejections under 35 U.S.C. § 103

The Office Action rejected claims 1-11 and 14-18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tresser et al. (U.S. Patent No. 6,804,373). The Office Action rejected claims 12 and 13 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tresser et al. in view of Linsker et al. (U.S. Patent No. 5,598,473). The Office Action rejected claims 19, 22 and 23 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tresser et al. in view of Brundage et al. (U.S. Patent Publication No. 2004/0181671). The Office Action rejected claims 20, 21, 24 and 25 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tresser et al. in view of Brundage and further in view of Linsker et al.

The Applicants respectfully traverse these rejections and submit that Tresser, alone or in any combination of Linsker and/or Brundage, does not disclose, teach or suggest all of the features of the independent claims, as amended.

For example, the Applicants' claimed invention now includes a halftoning process where a mixture of varying intensities of plural color planes is created with layered variable intensities of the plural color planes to form a colored multi-plane bitmap defined by specific placement and size of different colored ink drops. Support for these amendments can be found throughout the specification, and in particular, at least in paragraph [0012] of the Applicants' U.S. Patent Publication No. 2005/0166052 A1.

In contrast, Tresser merely discloses a halftoning process where an image (I) undergoes a particular process before being submitted to any halftoning process. In addition, Brundage simply disclose using digital watermarking in authenticating documents (see Abstract and Summary of Brundage) while Linsker merely discloses using digital signatures in authenticating documents (see Abstract and Summary of Linsker). Although a new image (I') is computed out of the image (I) by covering the image (I) with a grid of size H-by-V in Tresser, the grey levels are simply averaged on the little rectangles defined by the grid. (see col. 7, lines 7-9 of Tresser).

As a result, a halftoned version (M) of the new image (I') is computed using some preferred halftoning engine (see col. 7, lines 12-15 of Tresser), which means **unlike** the Applicants' independent claims, a grey level averaging process is performed on the image before the halftoning process is performed. Namely, in the Applicants' independent claims, the halftoning process creates a mixture of varying intensities of plural color planes with layered variable intensities of the plural color planes to form a colored.

Hence, the combined cited references are clearly missing these features of the Applicants' independent claims because Tresser instead simply disclose that once the **non-color** halftoned version (M) of the image is produced, it is cut into a plurality of pieces, wherein some of the pieces may be processed in an image compression engine, while others of the pieces may be processed by a digital signature scheme. Even if an RSA scheme can be used in Tresser (see col. 9, lines 8-19 of Tresser), **unlike** the Applicants' independent claims, the halftoning process creates a mixture of varying intensities of plural color planes with layered variable intensities of the plural color planes to form a colored.

Therefore, unquestionably, Tresser alone, or in any combination with Linsker and/or Brundage, still does **not** disclose, teach or suggest the Applicants' newly claimed features as discussed above.

With regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on the same basis. (MPEP § 2143.03). As such, withdrawal of the obviousness rejection of the claims is respectfully requested.

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to

withdraw the outstanding rejection of the claims and to pass this application to issue.
Additionally, in an effort to further the prosecution of the subject application, the
Applicant kindly **requests** the Examiner to telephone the Applicant's attorney at **(818)**
885-1575. Please note that all mail correspondence should continue to be directed to:

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